IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

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IN RE : CHAPTER 13

DAUN U. SANDLIN : CASE NO: 18-13643AMC

:

Debtor

: __:

DEBTOR'S RESPONSE TO TRUSTEE'S MOTION TO DISMISS

The Debtor, through counsel, responds to the motion of William C. Miller, Esquire, Chapter 13 Standing Trustee (the "Trustee"), to dismiss (the "Motion") as follows:

- 1. The Motion asserts that Debtor is not making payments.
- 2. As of the date of this Response, Debtor is current on her payments to the Trustee.
- 3. There is no cause for dismissal

WHEREFORE, Debtor prays that this Court enter an Order DENYING the Motion.

/s/ Alfonso G. Madrid ALFONSO MADRID, ESQ. Attorney for Debtor 757 South 8th St. Philadelphia PA 19147 (215) 925-1002 (215) 689-4809 (fax)